

May 14, 1999

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 12th Street, SW  
Washington, DC 20554

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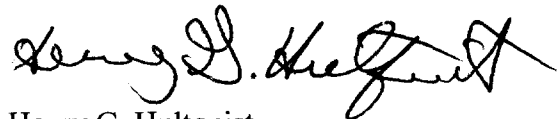
**Re: In the Matter of Florida Public Service Commission's Petition for Authority to Implement Number Conservation Measures, NSD File No. L-99-33; Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717 NSD File No. L-97-42; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98**

Dear Ms. Salas:

Enclosed herewith for filing are the original and four (4) copies of MCI WorldCom's Comments regarding the above-captioned matters.

Please acknowledge receipt by affixing an appropriate notation on the copy of the MCI WorldCom Comments furnished for such purpose and remit same to the bearer.

Sincerely yours,



Henry G. Hultquist

Enclosure  
HGH

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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In the Matter of:	)	
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Florida Public Service Commission's	)	
Petition for Authority to Implement	)	NSD File No. L-99-33
Number Conservation Measures	)	
	)	
Petition for Declaratory Ruling and Request	)	
for Expedited Action On the July 15, 1997	)	
Order of the Pennsylvania Public Utility	)	NSD File No. L-97-42
Commission Regarding Area Codes	)	
412, 610, 215 and 717	)	
	)	
Implementation of the Local Competition	)	
Provisions of the Telecommunications	)	CC Docket No. 96-98
Act of 1996	)	

COMMENTS OF MCI WORLDCOM, INC.

MCI WorldCom, Inc.  
Henry G. Hultquist  
Mary DeLuca  
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(202)887-2502

May 14, 1999

## **EXECUTIVE SUMMARY**

The Commission should not authorize the Florida Public Service Commission to fashion a state-specific solution to the problem of area code exhaust. Rapid area code exhaust is a national problem. The problem is caused by the antiquated practice of assigning numbers to service providers in blocks of ten thousand. Its solution requires the development of systems and processes that can be deployed on a national basis. Piecemeal solutions will only delay development and implementation of a national solution, and will erode the uniform administration of the numbering plan.

The Commission should authorize the Florida Public Service Commission to conduct a pooling trial using the software that is being developed to allow pooling to take place on a national basis, when that software is ready for testing. Such a trial will be required before pooling can be deployed more ubiquitously, and will make a valuable contribution to that deployment. The Commission should also authorize Florida to require the porting of unassigned numbers to meet specific customer requests, or for service providers that require fewer than twenty-five numbers in a particular rate area. The Commission should deny the Florida Public Service Commission's other requests for authority. If the Commission were to grant those requests, it would risk the unnecessary delay of development and implementation of a national solution at the cost of allowing states to depart from uniform administration of the numbering plan.

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FEDERAL COMMUNICATIONS COMMISSION  
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Act of 1996	)	

**COMMENTS OF MCI WORLDCOM, INC.**

Pursuant to the Commission's Public Notice DA 99-725, MCI WorldCom, Inc. (MCI WorldCom) hereby files Comments on the Florida Public Service Commission's Petition for Authority to Implement Number Conservation Measures (filed April 2, 1999) (FPSC Petition). The FPSC Petition seeks authority "to fashion a Florida specific solution to [the] existing numbering crisis."<sup>1</sup> MCI WorldCom shares the frustration of the Florida Public Service Commission (FPSC) with the rapid rate of area code exhaust in Florida and supports granting the FPSC authority to conduct a pooling trial with the Number Portability Administrative Center

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<sup>1</sup> FPSC Petition at 1, 6, and 8.

(NPAC) release 3.0, when that software is ready for testing. Given the diversity of service providers that do business in Florida, that state will provide an ideal laboratory in which to test the software release that is intended to allow pooling to take place throughout the country. Such a trial will not in any way constitute a “Florida specific solution,” but will instead make a valuable contribution to what is most needed: a national solution to a national problem. The numbering crisis in Florida is no different in kind from numbering crises that exist in far too many states. As the FPSC recognizes, the situation “is a natural consequence of issuing telephone numbers in blocks of ten-thousand.”<sup>2</sup> That practice is not unique to Florida and must not be “solved” with state-specific policies. Any piecemeal approach to this national problem can only delay the eventual implementation of a national solution, create unnecessary costs for service providers and their customers, and erode the uniformity of the numbering plan. Accordingly, MCI WorldCom supports granting the FPSC authority to conduct a pooling trial that is a coherent part of a national solution to the antiquated assignment practice that is causing premature area code exhaust in Florida and in many other states. MCI WorldCom also supports certain state commission activities with respect to unassigned number porting (UNP).

## **I. Background**

Since 1995, nine area codes have been implemented in Florida. As many as six of these may be in some stage of jeopardy at this time.<sup>3</sup> During the same period of time, numerous other

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<sup>2</sup> *Id.* at 2.

<sup>3</sup> *Id.* at 1.

states have also witnessed an acceleration in the pace of area code exhaust and relief. MCI WorldCom estimates that a minimum of fifty-nine NPAs throughout the country are either in jeopardy at this time, or soon will be. According to a report by the North American Numbering Plan Administrator (NANPA), a continuation of the current pace of area code relief will cause the exhaust of the North American Numbering Plan (NANP) to occur sometime between 2006 and 2012.<sup>4</sup> Rapid area code exhaust is a national problem that has serious ramifications for the entire NANP.

Not surprisingly, this nationwide epidemic of area code exhaust can be traced to a common cause: the “inefficient and troubling”<sup>5</sup> practice that requires local exchange carriers to obtain a block of ten-thousand numbers for each rate area in which they intend to offer service. This practice is a vestige of a bygone era. As long as the incumbent local exchange monopolists were the only service providers that required numbering resources, the assignment practice did not cause unduly rapid area code exhaust. However, expansions in wireless competition and the inception of local exchange competition have turned the assignment practice into an NXX-devouring mechanism for premature area code exhaust that threatens the life expectancy of the NANP.

A nationwide problem with a common cause should not be treated with state-specific

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<sup>4</sup> North American Numbering Plan Exhaust Study, North American Numbering Plan Administration (NANPA) Lockheed Martin CIS (submitted April 22, 1999). Industry efforts under the auspices of the NANC to validate the assumptions of this study confirm that there are differences of opinion with respect to some aspects of the study. However, it is clear that number resource optimization measures are required and will extend the life of the numbering plan.

<sup>5</sup> FPSC Petition at 2.

solutions. It is incumbent upon this Commission and the industry to develop more rational assignment practices that will reduce the pace of area code exhaust and extend the life of the NANP. Indeed, the Commission has opened a proceeding to examine several number resource optimization measures, including thousand-block pooling, unassigned number porting, and others.<sup>6</sup> The NANPA projects that implementation of thousand-block pooling alone will extend the expected life of the NANP by more than forty years. In anticipation of Commission action, the industry has been working on the development of the NPAC release 3.0.

National pooling requirements build on NPAC release 1.4. Although release 1.4 has been used in the Illinois pooling trial, NPAC release 3.0 is a necessary part of the development of the systems and processes that will eventually make thousand-block pooling and assignment an automated, scalable solution to the problem of premature area code exhaust. NPAC release 1.4 uses a rudimentary form of data representation, based upon the existing LNP architecture, to transfer data from the NPAC to the local service management system (SMS) and finally to the network databases, or SCPs. The NPAC broadcasts an implicit "pooled indicator" along with an NPAC record for every number in a given pooled block transaction. In contrast, the NPAC release 3.0 national requirements call for the NPAC broadcast message to contain an explicit pooled block indicator with only the start and end points in the number range to be pooled. Thus, the information distributed to the local SMS and routing databases will more efficiently represent the pooling of an entire block. This is called Efficient Data Representation (EDR). EDR minimizes data storage capacity and transmission requirements, and will allow more cost-

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<sup>6</sup> *In the Matter of Number Pooling and Other Optimization Methods*, Public Notice DA-2256, NSD File No. L-98-134 (rel. November 6, 1998) (NRO Proceeding).



effective implementation of pooling.

A carrier has two options to implement pooling prior to the deployment of NPAC release 3.0. The first requires that carrier systems receive each individual telephone number broadcast by the NPAC and then translate it to a range. Local SMS and routing database changes are required. These changes would necessarily be discarded upon deployment of NPAC release 3.0. The second option would require substantial database expansions to hold the additional NPAC 1.4 records, and would later require a massive conversion of these records to the EDR format to recover otherwise wasted storage capacity. A thorough analysis of any data conversion is required to ensure the reliability of network routing. To prevent the needless deployment of systems and processes to support pooling that would be obsolete upon implementation, the Commission and the industry must now establish the tools that will make pooling available in all places where local number portability has been implemented.

## **II. The FPSC Petition**

The FPSC has specifically requested authority to: (1) institute thousand-block (and perhaps hundred-block) number pooling; (2) implement sharing of NXX codes in rate centers; (3) revise rationing measures and institute NXX lotteries (prior to adoption of area code plans or establishment of an area code relief date) to prolong the life of existing area codes; (4) reclaim unused and reserved central office codes; (5) maintain current central office code rationing measures for at least six months after the implementation of all area code relief plans; (6) expand deployment of permanent number portability; (7) implement unassigned number porting; (8) implement rate center consolidation; (9) require wireless carriers to provide COCUS and other

information to the FPSC, and, (10) use LINUS to run NXX reports quarterly.<sup>7</sup> The FPSC has also requested that the Commission direct the NANPA to update the Central Office Code Utilization Survey (COCUS) quarterly, instead of annually, and establish code allocation standards to more efficiently manage numbering standards.<sup>8</sup>

The FPSC intends to exercise this authority, if granted, to fashion a Florida specific solution to the numbering crisis. However, Florida's numbering crisis is merely one example of a national outbreak. State specific actions may actually delay a cure of that outbreak insofar as they divert resources from development of a national solution. For example, state-by-state implementation of pooling in the absence of national pooling rules and guidelines would require state-by-state resolution of numerous issues.<sup>9</sup> Any resolution of these issues on a piecemeal basis would necessarily divert personnel and systems resources from focusing their attention on a national solution. Moreover, the benefits of uniformity in administration of the NANP should not lightly be sacrificed. Thus the Commission should grant the FPSC's requests only to the extent that the requested authority would contribute to, or at least not detract from, efforts to establish number resource optimization measures that would be available nationwide. In addition, the Commission should not allow Florida or other states to depart from uniform number

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<sup>7</sup> FPSC Petition at 3-6.

<sup>8</sup> *Id.* at 5.

<sup>9</sup> For a partial list of the actions that must be completed before pooling can occur in an individual state, see *In the Matter of Maine Public Utility Commission's Petition for Additional Delegated Authority to Implement Number Conservation Measures* (NSD File No. L-99-27), *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, Comments of MCI WorldCom at 9-10 (filed May 3, 1999).

administration policies on the basis of speculative assertions. Florida's numbering crisis was caused by the practice of assigning numbers in blocks of ten-thousand, not by number administration policies that govern the process by which service providers obtain access to numbers.

**A. Thousand-Block Pooling**

The Commission should authorize the FPSC to conduct a trial of thousand-block pooling that uses the NPAC release 3.0, when it is ready for testing, and adheres to all national guidelines. Such a trial will be beneficial to the industry as it prepares to implement pooling on a more widespread basis. NPAC release 3.0 will be a critical element in the establishment of pooling as a scalable replacement to the current NXX assignment practice, and that release must be tested before it can be rolled out nationally. Florida is an excellent state in which to conduct such a trial. Florida is a mid-sized market that includes three LNP-capable incumbent local exchange carriers (ILECs), as well as a number of competitive local exchange carriers (CLECs). By conducting this trial, Florida will make a valuable contribution to the Commission's efforts to address premature area code exhaust.

The FPSC has also requested that the Commission authorize it to consider hundred-block pooling. Such a measure is technically feasible, but would require significant additional development. Moreover, any benefits from hundred-block pooling would be largely attainable from UNP. At this time, the Commission should not authorize the FPSC to implement hundred-block pooling. The industry is clearly focused on thousand-block, and that focus should not be disturbed without a showing that hundred-block will provide significant incremental benefits

without delaying national pooling efforts.

### **B. NXX Code Sharing**

Code sharing would entail splitting the assignment of NXX codes among different service providers served by a common tandem switch. This would require translations in the tandem switches to segregate an NXX code among several switches. In MCI WorldCom's case, the ILEC typically provides the serving tandem. Thus, much of the burden would be placed on the ILEC. In addition to the network changes, carrier billing changes would also be required. According to the NRO Report, this measure will take 2-3 years to develop. Moreover, it should not be needed when thousand-block pooling and UNP are implemented. Any incremental number conservation benefits would be quite limited. Thus, the Commission should not authorize the FPSC to implement code sharing. Such implementation would be likely to distract the industry from the pooling trial.

### **C. Rationing and Lotteries**

Number rationing and lotteries are extreme measures that should only be adopted when necessary to prevent NPA exhaust from occurring before relief can be implemented. Rationing and lotteries inevitably have a disparate impact on new entrants, who are most likely to require numbers. The FPSC is seeking flexibility to require these measures prior to the adoption of a relief plan or selection of a relief date, in order to extend the lives of existing area codes while long-term numbering solutions are developed. It is not clear, however, that these potentially discriminatory policies are needed to achieve the FPSC's goals. The industry is already working

toward a sequential number assignment practice that will preserve the benefits from thousand-block pooling when it is implemented. Moreover, the FPSC has not explained why it cannot adopt a relief plan and select a relief date prior to implementing these potentially discriminatory policies. If granted, the requested authority would allow the state commission to avoid the difficult decisions associated with area code relief by imposing rationing and lotteries. Thus, the Commission should not grant the requested authority.

**D. Reclamation of Unused and Reserved Exchange Codes**

The FPSC is seeking authority to investigate whether any reserved central office codes can be reclaimed for future distribution, without causing disruption to carriers' network operations. The FPSC has not clearly described the codes that are at issue. MCI WorldCom urges the FPSC first to work with the NANPA and the industry to identify these codes and to investigate whether or not they could be reclaimed. If this proves unavailing, then the FPSC might renew its request with a more complete record. At this time, the record is insufficient for the Commission to grant the requested authority.

**E. Maintaining Rationing Measures After Implementation of Relief**

The FPSC seeks authority to rationing codes for at least six months after the implementation of all area code relief plans. This request is extremely vague. By its terms, it could conceivably include relief plans that have not yet been adopted for NPAs that may not even be in jeopardy at this point. Moreover, the request does not appear designed to address the problem that the FPSC identifies. According to the FPSC, the announcement of an area code

relief plan produces an artificial spike in demand for NXXs in the old area code. If such an artificial increase in demand actually occurs, then the use of rationing between the time of the announcement and actual implementation of relief would seem sufficient to deal with the problem. The FPSC has not described why it is necessary to extend rationing beyond the time when relief is implemented. When relief is implemented, demand may increase, but it does so only because it has been artificially limited during the period of rationing. The purpose of introducing a new area code is to ensure that numbers are available so that customers can order service from the carrier of their choice. Rationing is an emergency measure to prevent exhaust from occurring before relief can be completed. The justification for rationing ends when relief is completed. Accordingly, rationing must not be allowed to continue after the threat of imminent exhaust is eliminated.

#### **F. Expanded Deployment of Permanent Number Portability**

The FPSC seeks authority to expand deployment of permanent number portability, but does not describe why such authority is necessary. Existing rules already allow for number portability to be extended beyond the top one hundred MSAs.<sup>10</sup> The Commission cannot adequately evaluate the merits of the FPSC request without some description of how the authority would be exercised to either promote competition or conserve numbering resources. Thus, the Commission should deny the request.

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<sup>10</sup> 47 C.F.R. 52.23(c).

### **G. Unassigned Number Porting**

The FPSC also seeks authority to implement UNP as an additional tool to conserve numbering resources. Again, the FPSC fails to describe precisely what use it would make of UNP. MCI WorldCom has consistently supported a phased implementation for UNP.<sup>11</sup> State commissions would play a prominent role in the first phase, in which a service provider would obtain unassigned numbers from another service provider's inventory in response to the request of a specific customer. MCI WorldCom has also recently recommended that the Commission authorize the Maine Public Utility Commission to establish a trial in which carriers with extremely limited numbering needs in a particular rate area, would obtain no more than twenty-five numbers using UNP.<sup>12</sup> MCI WorldCom recommends that the Commission extend similar authority to the FPSC, so long as the FPSC also supports the procompetitive use of UNP to obtain numbers in response to the request of a specific customer.

### **H. Rate Center Consolidation**

Inexplicably, the FPSC is seeking authority to implement rate center consolidation. It is MCI WorldCom's belief that the FPSC does not require any authority that this Commission can delegate to implement rate center consolidation. There are circumstances in which rate center

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<sup>11</sup> See, e.g., *In the Matter of Number Pooling and Other Optimization Methods*, Public Notice DA-2256, NSD File No. L-98-134, Comments of MCI WorldCom.

<sup>12</sup> *In the Matter of Maine Public Utility Commission's Petition for Additional Delegated Authority to Implement Number Conservation Measures* (NSD File No. L-99-27), *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, Comments of MCI WorldCom at 8.

consolidation can provide number conservation benefits. However, it can also limit future relief options and may affect the boundaries between toll calling and local calling. Once rate centers are consolidated, future area code relief cannot take the form of geographic split that divides the consolidated rate center. Recent experience in Phoenix has shown that such a split is both inefficient and discriminatory. The Arizona Corporation Commission ordered a three-way geographic split of a single, consolidated rate center. That split will place CLEC customers with the same NXX on different sides of the area code boundaries. Thus the split will entail either that some CLEC customers change numbers, or that NXX codes are activated long before they would actually be needed to meet customer demand. Moreover, some ported customers of CLECs will be discriminated against in any case. Whatever action the FPSC takes with respect to rate center consolidation should not ignore the impact of such consolidations on future relief plans or on toll and local boundaries.

#### **I. Use of LINUS**

The FPSC has requested that the Commission grant it express permission to use LINUS to run quarterly NXX reports. However, LINUS is still being developed and evaluated by the NRO Working Group under the North American Numbering Council (NANC). Indeed, the Commission has recently requested that the NANC complete a recommendation on LINUS to the Commission by June 30, 1999 on a replacement for COCUS that undoubtedly will contain many elements of LINUS. Thus, the FPSC's request is premature. Moreover, the FPSC has provided no indication of the use which it intends to make of quarterly LINUS. The Commission should not authorize the FPSC to undertake unidentified number administration activities that may or



may not promote objectives that are appropriate for a state commission to pursue. The Commission has consistently recognized the importance of uniformity in number administration and should compromise that uniformity.

**J. Authority to Require Wireless Carriers to Provide COCUS and Other Information**

The FPSC has already been delegated the authority to oversee area code relief.<sup>13</sup> This delegation necessarily includes the authority to request and obtain information that it requires to perform its area code relief duties. If the FPSC requests this information from any carrier, it does so pursuant to authority that has been delegated by the Commission, not in its ordinary capacity as a state commission acting within state commission jurisdiction. Wireline carriers routinely provide this data, as should wireless carriers.

**K. Directions to NANPA**

The FPSC has requested that the Commission direct the NANPA to update the COCUS report on a quarterly basis and establish code allocation standards. The COCUS change would require a rule change.<sup>14</sup> It would also require changes in the NANPA's compensation agreement. According to the FPSC, quarterly data would provide more current information for planning area code relief. However, the FPSC has not shown that quarterly reports would provide significant benefits when compared to other potential reporting intervals. For example, semi-annual reports

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<sup>13</sup> 47 C.F.R. 52.19.

<sup>14</sup> 47 C.F.R. 52.15(b)(3).

might provide sufficiently current information in a less burdensome manner. In any case, the rule change that would be necessary for the requested change to COCUS, would require development of a more substantial record than the FPSC has provided.

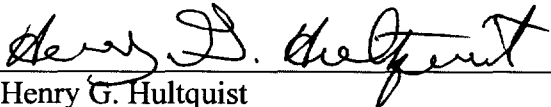
According to the FPSC, the NANPA should establish code allocation standards to more efficiently manage numbering resources. These would include a requirement that the NANPA consult with the FPSC before issuing NXX codes. The FPSC has not, however, shown, or even asserted, that its numbering crisis was caused by the improper issuance of NXX codes. Indeed, the FPSC correctly blames Florida's numbering crisis on the inefficient practice of assigning numbers in blocks of ten-thousand, not on anything that the NANPA has done. The current guidelines have not caused Florida's crisis. Their replacement will not cure it. As the industry has learned in Connecticut, any requirement that the NANPA consult with a state commission prior to issuing an NXX code, will only delay the ability of service providers to obtain numbers without providing any conservation benefits since, eventually, the codes will be issued. The Commission should refuse to grant authority to the FPSC when the requested authority will do nothing to alleviate Florida's numbering situation.

### **III. Conclusion**

The Commission should not permit the FPSC or any other state commission to fashion state-specific solutions to the national problem of premature area code exhaust. Such solutions can only erode the uniformity of the NANP and delay the implementation of a national solution to this problem. Instead, the Commission should allow the FPSC to conduct a thousand-block pooling trial with the NPAC release 3.0 when it is ready to be tested. The FPSC should also be

permitted to authorize the use of UNP to support specific customer requests or to enable service providers with extremely limited numbering needs to establish a service footprint. The Commission should not at this time grant the FPSC's other requests for authority.

Respectfully submitted,  
MCI WorldCom, Inc.



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May 14, 1999

## **CERTIFICATE OF SERVICE**

I, Vivian Lee, do hereby certify that copies of the foregoing Comments of MCI WorldCom, Inc. were sent via first class mail, postage paid, to the following on this 14th day of May, 1999.

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